

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY, NEWARK DIVISION**

ISRAEL ALBERT ALMEIDA and)
MICHAEL R. TUMMINELLI)
Plaintiffs,) Case No. 2:16-cv-03411-KM-JBC
)
v.)
THE HON. N. PETER CONFORTI, et al.)
Defendants.)
)

REQUEST FOR ENTRY OF DEFAULT

COMES NOW, Plaintiffs Israel Albert Almeida and Michael R. Tumminelli, by and through undersigned counsel, and hereby request the Clerk to enter a default against Defendant Sussex County on the basis that the record in this case demonstrates that there has been a failure to plead or otherwise defend as provided by Rule 55(a) of the Federal Rules of Civil Procedure.

This, the 22nd day of August, 2016.

Respectfully submitted,

/s/ Ryan S. Watson
RYAN S. WATSON

Of Counsel:

Ryan S. Watson
Law Offices of J. Scott Watson, P.C.
24 Regency Plaza
Glen Mills, PA 19342
(610) 358-9600
NJ Bar No. 089642013
ryan.watson@jscottwatson.com

Stephen D. Stamboulieh
Stamboulieh Law, PLLC
P.O. Box 4008
Madison, MS 39130
(601) 852-3440
stephen@sdslaw.us
MS Bar No. 102784
*Admitted Pro Hac Vice

Alan Alexander Beck
Law Office of Alan Beck
4780 Governor Drive
San Diego, CA 92122
(619) 905-9105
Alan.alexander.beck@gmail.com
*Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on August 22nd, 2016, I electronically filed the foregoing document or pleading using the CM/ECF system which generated a NEF for all counsel of record.

I hereby certify that the following non-CM/ECF participants were served a copy of the foregoing document or pleading by United States Postal Service, postage prepaid.

Sussex County
Office of the County Administrator
One Spring Street
Newton, NJ 07860

By: /s/ Ryan S. Watson
Ryan S. Watson